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AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
DEPUTY

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

MINECODE, LLC.,
PRADYUMNA KUMAR SAMAL, and
SANDEEP VERMA,

Defendants.

NO. CRO9-5MAT

INFORMATION
(Misdemeanor)

The United States Attorney charges that:

COUNT 1

(Computer Intrusion---December 2006)

I. Background

At all times material herein,

1. MINECODE, LLC. ("MINECODE") was a computer programming and website development company located in Bellevue, Washington.

2. Vinado, Inc. ("Vinado") was an e-commerce wine supplier based in Seattle, Washington, which in the fall of 2006, hired MINECODE to design features for its website, including a virtual gift shop ("the gift shop") for Vinado's website.

3. PRADYUMNA KUMAR SAMAL was the Chief Executive Officer and President of MINECODE.

4. SANDEEP VERMA was an employee of MINECODE and the Project Manager for the Vinado account.

II. The Offense

5. In about December 2006, within the Western District of Washington, MINECODE, LLC, PRADYUMNA KUMAR SAMAL, and SANDEEP VERMA intentionally accessed without authorization a protected computer, namely, the computer system of Vinado that was used in interstate commerce and communication, and as a result of such conduct caused damage, by entering commands that disabled the gift shop and other features on Vinado's website that MINECODE had designed, resulting in a loss to Vinado during a one-year period in an amount exceeding \$5000 in value.

All in violation of Title 18, United States Code, Section 1030(a)(5)(A)(iii).

COUNT 2

(Computer Intrusion---January 30, 2007)

1. Paragraphs 1 through 4 of Count 1 of this Indictment are hereby realleged and incorporated herein by reference.

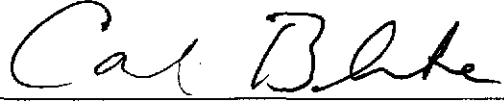
2. On or about January 30, 2007, within the Western District of Washington, MINECODE, LLC, and PRADYUMNA KUMAR SAMAL intentionally accessed without authorization a protected computer, that is, the computer system of Vinado, which was used in interstate commerce and communication, by entering commands that deleted Vinado's website,

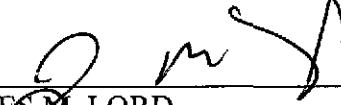
1 e-mail server, and database, resulting in a loss to Vinado during a one-year period in an amount
2 exceeding \$5000 in value.

3 All in violation of Title 18, United States Code, Section 1030(a)(5)(A)(iii).

4
5 DATED this 7th day of January 2009.

6 
7 JEFFREY C. SULLIVAN
8 United States Attorney

9 
10 CARL BLACKSTONE
11 Assistant United States Attorney

12 
13 JAMES M. LORD
14 Assistant United States Attorney